

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CHERYL PENNANT,)	
)	
Plaintiff,)	No. 11-01697 MJP
)	
v.)	STIPULATION FOR ORDER OF
)	DISMISSAL
THE BOEING EMPLOYEES' CREDIT)	
UNION, PSCU FINANCIAL SERVICES, INC.))	
AND COLLECTION AGENTS 1-10,)	NOTE ON MOTION CALENDAR:
)	Monday, July 9, 2012
Defendants.)	
)	
)	

STIPULATION

Plaintiff Cheryl Pennant ("Plaintiff") and Defendants The Boeing Employees' Credit Union ("BECU"), PSCU Financial Services, Inc. ("PSCU"), and Collection Agents 1-10 (collectively, the "Defendants") stipulate, agree and acknowledge that Plaintiff, along with K. Michael Fitzgerald in his capacity as the Chapter 13 Trustee of Plaintiff's bankruptcy estate under Case No. 12-12350 in the United States Bankruptcy Court for the Western District of Washington, have settled all of Plaintiff's claims against Defendants pursuant to the Parties' Settlement Agreement effective May 11, 2012, which Settlement was subsequently approved by the Bankruptcy Court on the 22nd day of June, 2012. The Parties further stipulate to the entry of an Order of Dismissal in the form proposed contemporaneous with the filing of this Stipulation,

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dismissing all of Plaintiffs claims against Defendants with prejudice and dismissing all of BECU's counterclaims against Plaintiff without prejudice. Such dismissals are to be without fees or costs to any party. Nothing in this Stipulation or the Order of Dismissal is intended to impair or otherwise prejudice any of BECU's rights with respect to its claims pending in Plaintiff's bankruptcy case. Nothing in this Stipulation or the Dismissal Order are intended to prejudice the putative class members' claims, if any, should such members wish to file similar claims against Defendants. The Parties' further acknowledge that their Settlement was negotiated at arms-length, and in good faith, and is not otherwise the result of any collusion; moreover, the Lawsuit has not received public attention or notoriety such that the absent members of the putative class may have relied on the class allegations by foregoing the filing of their own claims; as such, the parties do not believe notice of the dismissal order is necessary.

SO STIPULATED this 9th day of July, 2012.

<p>FOSTER PEPPER PLLC</p> <p><u>/s/ Neil A. Dial</u> Tim J. Filer, WSBA #16285 Neil Dial, WSBA #29599 Attorneys for Defendant Boeing Employees' Credit Union 1111 Third Avenue, Suite 3400 Seattle, Washington 98101-3299 Telephone: (206) 447-4400 Facsimile: (206) 447-9700</p>	<p>WILLIAMSON & WILLIAMS</p> <p><u>/s/ Rob Williamson</u> Kim Williams, WSBA No. 9077 Rob Williamson, WSBA No. 11387 Attorneys for Plaintiff Cheryl Pennant 17253 Agate Street NE Bainbridge Island, WA 98110 Telephone: 206-780-4447 Facsimile: 206-780-5557</p>
<p>CARLSON & MESSER LLP</p> <p><u>/s/ David J. Kaminski</u> David J. Kaminski, Esq. Attorneys for Defendant PSCU Financial Services, Inc. 5959 W. Century Boulevard, Suite 1214 Los Angeles, CA 90045 Telephone: (310) 242-2204 Facsimile: (310) 242-2222</p>	<p>LAW OFFICES OF DUANE M. DAWSON</p> <p><u>/s/ Duane M. Dawson</u> Duane M. Dawson, WSBA No. 41308 Attorneys for Plaintiff Cheryl Pennant 8825 - 34th Ave. NE #L-537 Marysville, WA 98271 Telephone: 425-405-5750 Facsimile: 425-974-7439</p>

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